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Arizona Corporation Commission

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W-01303A-02-0908  
W-01303A-01-0983Commissioner Kristin Mayes,  
Arizona Corporation Commission

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I am writing in regard to the Arizona American Water's plans to meet the new arsenic level as mandated by the US Government.

I see a number of problems in this mandate, and in the way in which Arizona American Water is proposing to meet this mandate.

The first issue is the fact that the new mandated level of arsenic was hastily arrived at without adequate scientific information as to what would be an acceptable level. The present figure was more of a political judgment than a realistic and scientifically based approach. The financial impact on individual utilities was not properly studied and no provision for Federal or State money was provided to help small utilities meet this mandate.

In this case, and many other cases like it, small water companies are faced with the financial problem of how to pay for the expensive treatment facilities needed to comply. The Tubac customers are faced with financing this proposed facility based on the number of customers, which is in the neighborhood of 528 hookups. We are told to expect an increase above and beyond the current usage rate, of about \$76 / Mo. This amounts to about an annual increase of \$912 per customer. Multiplying this by 528 is \$481,536 / year. The figures I have heard are that this would continue for 5 years, amounting to a total of \$2,407,680 or \$4,560 per customer. All this in addition to present usage costs.

This is not a viable situation.

Arizona American Water has chosen a very expensive method of achieving this the new mandated level. Other people, both local and professional, have studied and researched several alternative ways to meet this mandate that would be much less expensive and equally as affective. We need more time for study and public education of this issue. Arizona American Water has done little in educating and seeking input from the public. True, they have met with certain individuals and groups, but there has not been much effort to involve the general customer base in discussion making, and seeking input at the user level. We get numerous fliers of various kinds in our monthly water bills that have nothing to do with this problem, but have never been fully informed as to current plans what lies ahead.

It must be understood that the Federal Government and States must finance a government mandate like this, at least partially. Adequate time should be given for small water companies to comply and finance such major mandates.

Specifically, I request that you do all you can to use your influence as Corporate Commissioner to seek an extension of the deadline to allow a more realistic study and approach this problem.

Respectfully Submitted,

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